## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

PHARMACY, INC. PRODUCTS LIABILITY LITIGATION	) ) ) )
THIS DOCUMENT RELATES TO:	) MDL No. 2419 ) Dkt. No 1:13-md-2419 (RWZ)
All Suits Against the Saint Thomas Entities	) ) )
	)

## JOINT STIPULATION FOR EXTENSION OF TIME TO FILE RESPONSE TO PSC'S MOTION TO COMPEL RESPONSES TO CERTAIN INTERROGATORIES

On November 19, 2014, the Plaintiffs' Steering Committee ("PSC") moved this Court for an order compelling the Saint Thomas Entities to respond to certain interrogatories. *See* Dkt. No. 1549 (the "Motion"). Pursuant to the Court's MDL Order No. 11 (Dkt. No. 1524), the impacted parties, which consist of the PSC and Saint Thomas West Hospital f/k/a St. Thomas Hospital, Saint Thomas Health, and Saint Thomas Network (the "Saint Thomas Entities"), previously agreed to extend the time for the Saint Thomas Entities to respond to the PSC's Motion to Compel to December 22, 2014. The parties remain in discussions regarding the issues raised in the PSC's Motion to Compel to further narrow the issues, if any, to be presented to the Court. Accordingly, the PSC and the Saint Thomas Entities agree to extend the time for the Saint Thomas Entities to respond to the PSC's Motion to Compel to January 7, 2015.

53824615.1 - 1 -

Dated: December 22, 2014

Respectfully submitted,

/s/ Sarah P. Kelly

Sarah P. Kelly (BBO #664267) skelly@nutter.com

NUTTER McCLENNEN & FISH LLP Seaport West 155 Seaport Boulevard Boston, Massachusetts 02210 (617) 439-2000 (617) 310-9000 (FAX)

## OF COUNSEL:

Yvonne K. Puig\*
Texas State Bar No. 16385400
yvonne.puig@nortonrosefulbright.com
Adam T. Schramek\*
Texas State Bar No. 24033045
adam.schramek@nortonrosefulbright.com
Eric J. Hoffman\*
Texas State Bar No. 24074427
eric.hoffman@nortonrosefulbright.com

FULBRIGHT & JAWORSKI LLP 98 San Jacinto Blvd., Suite 1100 Austin, Texas 78701 (512) 536-2450 (512) 536-4598 (FAX)

Marcy Hogan Greer\*
Texas State Bar No. 08417650
mgreer@aditlaw.com

ALEXANDER DUBOSE JEFFERSON & TOWNSEND LLP 515 Congress, Suite 2350 Austin, Texas 78701 (512) 482-9300 (512) 482-9303

Counsel for Saint Thomas Entities

53824615.1 - 2 -

<sup>\*</sup>Appearing Pro Hac Vice

/s/ Benjamin A. Gastel

J. Gerard Stranch, IV Benjamin A. Gastel BRANSTETTER, STRANCH & JENNINGS PLLC

227 Second Avenue North Nashville, TN 37201 Telephone: (615) 254-8801

Facsimile: (615) 255-5419 gerards@branstetterlaw.com beng@branstetterlaw.com

Plaintiffs' Steering Committee and Tennessee State Chair

53824615.1 - 3 -

## **CERTIFICATE OF SERVICE**

I certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing this 22nd day of December, 2014.

/s/ Sarah K	Kelly
Sarah P. k	Kelly

53824615.1 - 4 -